

FILED  
U.S. DISTRICT COURT  
DISTRICT OF MARYLAND

2012 NOV 28 5:34

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BY RC DEPUTY

1 NIVEA OQUENDO, ALL RIGHTS RESERVED — U.C.C. 1-207, U.C.C. 1-207/4. U.C.C.1-308,  
2 U.C.C.1-103.6, Natural Person IN FULL LIFE, SUI JURIS, IN PROPRIA PERSONA  
3 2114 Alice Ave. Apt 201  
4 Oxon Hill, Maryland 20746  
5 240-600-2959

6 IN THE UNITED STATES DISTRICT COURT  
7 DISTRICT OF MARYLAND

8 NIVEA OQUENDO, ALL RIGHTS RESERVED — U.C.C. 1-207, U.C.C. 1-207/4 U.C.C.1-308,  
9 U.C.C.1-103.6, Natural Person IN FULL LIFE, SUI JURIS, IN PROPRIA PERSONA, PRO SE,  
10 Plaintiff, Claimant

11 VS,

12 Civil Action No. JFM 12 CV 3509

13 RJM ACQUISITIONS LLC  
14 SCOTT MATTE, CEO  
15 575 UNDERHILL BLVD  
16 SYASSET, NEW YORK 11791

17 Defendant, Respondent

18 COMPLAINT

19 PRELIMINARY STATEMENT

20  
21 1. This is an action for damages brought from violations of the Fair Credit Reporting  
22 Act (FCRA) 15 U.S.C. §1681 *et seq.*

23 JURISDICTION

24  
25 2. The jurisdiction of this Court is conferred by Title 15 U. S. C. §1681p.

26 FACTUAL ALLEGATIONS

27  
28 3. On July 25, 2011, Defendant initiated a credit inquiry of Plaintiff's credit report from  
TRANSUNION without permissible purpose.

**COUNT I**

**VIOLATION OF FAIR CREDIT REPORTING ACT (FCRA), 15 U.S.C. §1681  
WILLFUL NON-COMPLIANCE BY DEFENDANT RJM AQUISITIONS LLC, DEBT  
COLLECTOR**

3. Plaintiff is a consumer within the meaning of the FCRA, Title 15 U.S.C. §1681a(c).

4. RJM AQUISITIONS LLC, is a furnisher of information within the meaning of the FCRA,  
15 U.S.C. §1681s-2.

5. RJM AQUISITIONS LLC, willfully violated the FCRA.

6. Defendant's violations include, but are not limited to, the following:

(a) RJM AQUISITIONS LLC, willfully violated Title 15 U.S.C. §1681b (f) by obtaining  
Plaintiffs consumer report without a permissible purpose as defined by Title 15 U.S.C. §1681b.

WHEREFORE, Plaintiff demands judgment for damages in the amount of \$1,000 a  
Month from the date of credit pull against consumer credit report.

RJM AQUISITIONS LLC, are liable for actual or statutory damages, and punitive damages,  
attorney's fees and costs, pursuant to Title 15 U.S.C. §1681n.

**COUNT II**

**VIOLATION OF FAIR CREDIT REPORTING ACT (FCRA), Title 15 U.S.C. §1681  
NEGLIGENT NON-COMPLIANCE BY DEFENDANT RJM AQUISITIONS LLC, DEBT  
COLLECTOR**

7. RJM AQUISITIONS LLC, DEBT COLLECTOR is a furnisher of information within the meaning of the FCRA, Title 15 U.S.C. §1681s-2.

8. RJM AQUISITIONS LLC, negligently violated the FCRA. Defendant's violations include, but are not limited to, the following:

(a) RJM AQUISITIONS LLC, negligently violated Title 15 U.S.C. §1681b (f) by obtaining Plaintiff's consumer report without a permissible purpose as defined by Title 15 U.S.C. §1681b.

**WHEREFORE**, Plaintiff demands judgment for damages in the amount of \$1,000 a month from the date of credit pull against consumer credit report. RJM AQUISITIONS LLC, (DEBT COLLECTOR) are liable for actual damages, and attorney's fees and costs, pursuant to Title 15 U.S.C. § 1681o.

#### **RELIEF**

**WHEREFORE**, Plaintiff demands judgment for damages against RJM AQUISITIONS LLC, in the amount of \$30,000 for actual or statutory damages, and punitive damages, attorney's fees and costs, pursuant to Title 15 U.S.C. §1681n (a) (3) and Title 15 U.S.C. §16810 (a)

#### **DEMAND FOR JURY TRIAL**

Plaintiff hereby demands a trial by jury of all issues as a matter of law.

Respectfully submitted this 28<sup>th</sup> day of December, 2012.

X Nivea C. Oquendo All Rights Reserved

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